

STATE - EPA MEETING
Wednesday June 3, 1992
Harco Site, Old Mill Road, wilton, CT

AGENDA

- 10:00 • State ARAR's
- Administrative Record
 - a. US EPA funding available
 - b. Action Memorandum
 - c. Record of Decision
 - Extent of Contamination Study
Roy F. Weston, Inc - March 1992
 - a. Potential offsite migration
 - b. Point source
 - c. Area of contamination
 - d. Removal options
 - Cleanup Levels
 - a. EPA OSWER Directive for lead
(Residential vs. Commercial)
 - US EPA-ERT/REAC Treatability Study
Final Report March 22, 1992
 - a. Environmental impact
 - b. Cleanup options
 - c. Cleanup levels
 - Wetlands Issues
 - a. restoration
 - Permits Waiver (state/local)
 - a. disposal tax
 - b. transportation
 - c. construction
 - State of Connecticut Role
 - RCRA Action at the Gibert & Bennett facility
 - a. Cleanup levels
 - b. Zinc impact to cleanup
 - c. PRP Notice for Harco site



"DRAFT"

MEMORANDUM

TO: Harco Property Site File

FROM: Paul F. Killian, Roy F. Weston, Inc., Technical Assistance Team

RE: June 3, 1992 Meeting with CT DEP, and Site Visit

DATE: June 9, 1992

On June 3, 1992 U.S. EPA On-Scene Coordinator (OSC) Paul Groulx and Technical Assistance Team (TAT) member Paul Killian met with Melissa Blais and Doug Zimmerman, of the Connecticut Department of Environmental Protection (CT DEP) to discuss the Harco Property site, located in Wilton, Connecticut. The meeting was held at 18/20 Trinity Street in Hartford, Connecticut at 1000 hours. The CT DEP was presented with a copy of the Administration Record, the TAT Extent of Contamination Survey, and the U.S. EPA Environmental Response Team (ERT) Treatability Study. A copy of the agenda is included in Attachment I.

- OSC Groulx informed the CT DEP that the site would be cleaned up to a level of 500 ppm lead.
- OSC Groulx requested the CT DEP to investigate disposal options. The CT DEP stated that if the sludge could be separated from the slag, the sludge could be used as landfill cover. The slag, due to its high TCLP results, would have to be handled separately.
- It was agreed that the Harco Property site would be handled separately than the Gilbert and Bennett site, currently going through closure. However, the CT DEP stated that they would contact the state RCRA personnel to determine how the Gilbert and Bennett closure was to be handled. The CT DEP also stated that persons should contact Michael Mc Daniel if they know of area where Gilbert and Bennett deposited the sludge.
- OSC Groulx informed the CT DEP that restoration of the wetlands was not going to be performed under this cleanup. The CT DEP stated that this was not a problem and the major concern was removing the sludge from the site.

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- OSC Groulx requested the CT DEP to obtain waivers for state tax on transportation and disposal tax. The CT DEP was also requested to provide the state Applicable or Relevant and Appropriate Requirements (ARARs).
- OSC Groulx informed the CT DEP that his timetable plans to have a Final Workplan prepared within three weeks. However, work will not begin until all the costs are accounted and are within the budget. Work will also be delayed until a location has been determined to send the waste.
- Finally, OSC informed the CT DEP that they were welcome at the site any time, and are free to attend any meetings. OSC Groulx invited the CT DEP to the meeting that afternoon with the cleanup contractor, and to the two meetings tomorrow, one with Gilbert and Bennett and the other with the Town of Wilton.

Following the meeting with the CT DEP, OSC Groulx and TAT member Killian proceeded to Wilton, Connecticut. At 1325 they met with Garrett Arai and Christopher Doud, of Guardian Environmental Services, Inc., (cleanup contractors). The cleanup contractors were given a copy of the TAT Extent of Contamination Survey and the ERT Treatability Study. At 1330 Costa Stergue and Thomas King arrived and were given a copy of the Administrative Record, the TAT Extent of Contamination Survey, and the ERT Treatability Study. At 1410 the cleanup contractors were shown the site. There they observed site conditions and collected samples for disposal tests. At 1600 everyone departed the site. TAT member Killian returned to the TAT office, while OSC Groulx remained for a meeting with Gilbert and Bennett, and the Town of Wilton.

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STATE - EPA MEETING
Harco Site, 44 Old Mill Road, Wilton, CT

AGENDA

Tuesday - June 16, 1992 @ 10:00 a.m., State Office, 5th floor, 18-20 Trinity Street, Hartford, CT.

OBJECTIVES: How to effectively spend the limited EPA allocated Removal Budget of \$480,000 at the Harco site.

BACKGROUND:

- Administrative Record
 - a. Action Memorandum
- Extent of Contamination Study-March 1992

REMOVAL OPTION

- ERT/REAC Treatability Study-March 22, 1992
 - a. Environmental impact
 - b. Cleanup option levels
 - c. Cleanup levels (EPA OSWER Directive)

ISSUES

- Limited EPA \$\$\$ for project
- Wetlands
 - a. High water table
 - b. emergency water discharge requirements
 - c. restoration
- Limited roadway access

STATE of CONNECTICUT ROLE

ARAR's

GILBERT and BENNETT FACILITY

- PRP Notice for the Harco site
- RCRA Action at the Gilbert & Bennett facility
 - a. Cleanup/closure

BACKGROUND: 800 cubic yard of sludge and slag was deposited at the site. It was compounded by the onsite solidification and burial with on site materials to an estimated volume of 3200 cubic yards.

PROBLEMS: A high water table exist due to a perched collection system. The proximity to nearby wetlands and the requirement during excavation to pump, treat and discharge involve local wetlands regulations. Due to the water problems on site, any excavation should be performed during the dry season of July, August or September. Another problem is the limited access and roadway system up to the site due to the heavy bedrock formation of the area.